## Case 3:18-cv-01891-VC Document 46 Filed 05/09/18 Page 1 of 7

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| 10 | Attorneys for Defendant Facebook, Inc.   |   |  |
| 11 |  |   |  |
| 12 | UNITED STATES DISTRICT COURT   |   |  |
| 13 |  |   |  |
| 14 | ASHLEY GENNOCK and RANDY NUNEZ, on behalf of themselves and all others similarly |   |  |
| 15 | situated,  | CASE NO. 3:18-CV-01891-VC   |  |
| 16 | Plaintiffs,  | SAN FRANCISCO DIVISION  |  |
| 17 | v.   | CONSENT MOTION  |  |
| 18 | FACEBOOK, INC. and CAMBRIDGE<br>ANALYTICA  | DEFENDANT FACEBOOK, INC.'S  |  |
|    | Defendants.  | REPLY IN SUPPORT OF MOTION TO STAY  |  |
| 19 |  | Hearing Date: May 24, 2018  |  |
| 20 |  | Time: 10:00 a.m.  |  |
| 21 |  | Location: Courtroom 4, 17 <sup>th</sup> Floor, 450 Golden Gate Avenue, San Francisco, California, |  |
| 22 |  |   |  |
| 23 |  |   |  |
| 24 | (additional co   | aptions below)  |  |
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FACEBOOK, INC.'S REPLY IN SUPPORT OF MOT. TO STAY – CASE NO. 3:18-CV-01891-VC

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| 1  | LAUREN PRICE, on behalf of herself and all others similarly situated,     |   |
|----|---|---|
| 2  | Plaintiffs,   | CASE NO. 3:18-CV-01732-VC                           |
| 3  | V.  | SAN FRANCISCO DIVISION                              |
| 4  |   |   |
| 5  | FACEBOOK, INC. and CAMBRIDGE ANALYTICA,                                   |   |
| 6  | Defendants.   |   |
| 7  |   |   |
| 8  |   |   |
| 9  | JONATHAN D. RUBIN on behalf of himself and all others similarly situated, |   |
| 10 | Plaintiff,  | CASE NO. 3:18-CV-01852-VC<br>SAN FRANCISCO DIVISION |
| 11 | v.  | CONSENT MOTION                                      |
| 12 | FACEBOOK, INC., SCL GROUP, GLOBAL   | CONSERT MOTION                                      |
| 13 | SCIENCE RESEARCH LTD., and CAMBRIDGE ANALYTICA LLC                        |   |
| 14 | Defendants.   |   |
| 15 |   |   |
| 16 | HOWARD O'KELLY, on behalf of himself and all others similarly situated,   |   |
| 17 | Plaintiffs,   | CASE NO. 3:18-CV-01915-VC                           |
| 18 | ·   | SAN FRANCISCO DIVISION                              |
| 19 | V.  | CONSENT MOTION                                      |
| 20 | FACEBOOK, INC. and CAMBRIDGE<br>ANALYTICA                                 |   |
| 21 | Defendants.   |   |
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| 1<br>2<br>3<br>4<br>5<br>6 | THERESA BEINER and BRANDON HAUBERT, et al., on behalf of themselves and all others similarly situated,  Plaintiffs,  v.  FACEBOOK, INC. and CAMBRIDGE ANALYTICA, LLC  Defendants. | CASE NO. 3:18-CV-01953-VC<br>SAN FRANCISCO DIVISION<br>CONSENT MOTION |
|----------------------------|---|---|
| 7                          |   |   |
| 8                          | SUZIE HASLINGER, on behalf of herself and all others similarly situated,  |   |
| 10                         | Plaintiff,  | CASE NO. 3:18-CV-01984-VC<br>SAN FRANCISCO DIVISION                   |
| 11                         | v.  | CONSENT MOTION  |
| 12                         | FACEBOOK, INC. and CAMBRIDGE<br>ANALYTICA LLC   | CONSENT MOTION  |
| 13                         | Defendants.   |   |
| 14                         | Beteridants   |   |
| 15                         |   |   |
| 16<br>17                   | DEBRA KOOSER and MARGARET FRANKIEWICZ, on behalf of themselves and all others similarly situated,   | CASE NO. 3:18-CV-02009-VC   |
| 18                         | Plaintiffs,   | SAN FRANCISCO DIVISION  |
| 19                         | v.  | CONSENT MOTION  |
| 20                         | FACEBOOK, INC., CAMBRIDGE   |   |
| 21                         | ANALYTICA, SCL Group, Ltd, and Global Science Research Ltd.   |   |
| 22                         | Defendants.   |   |
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FACEBOOK, INC.'S REPLY IN SUPPORT OF MOT. TO STAY – CASE NO. 3:18-CV-01891-VC

| 1  | TAYLOR PICHA, on behalf of herself and all others similarly situated,     |   |
|----|---|---|
| 2  | Plaintiff,  | CASE NO. 3:18-CV-02090-VC                           |
| 3  | v.  | SAN FRANCISCO DIVISION                              |
| 4  | FACEBOOK, INC. and CAMBRIDGE  |   |
| 5  | ANALYTICA   |   |
| 6  | Defendants.   |   |
| 7  |   |   |
| 8  | CHRISTINA LADA IO   |   |
| 9  | CHRISTINA LABAJO, on behalf of herself and all others similarly situated, |   |
| 10 | Plaintiff,  | CASE NO. 3:18-CV-02093-VC<br>SAN FRANCISCO DIVISION |
| 11 | v.  |   |
| 12 | FACEBOOK, INC. and CAMBRIDGE<br>ANALYTICA                                 |   |
| 13 | Defendants.   |   |
| 14 | Defendants.   |   |
| 15 |   |   |
| 16 | JOSHUA IRON WING and RYAN MCGRATH,  |   |
| 17 | on behalf of themselves and all others similarly situated,                | CASE NO. 3:18-CV-02122-VC                           |
| 18 | Plaintiffs,   | SAN FRANCISCO DIVISION                              |
| 19 | v.  | CONSENT MOTION                                      |
| 20 | FACEBOOK, INC.  |   |
| 21 | Defendant.  |   |
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| 1 2    | SANFORD BUCKLES, on behalf of himself and all others similarly situated, | CASE NO. 3:18-CV-02189-VC                           |
|--------|--|---|
| 3      | Plaintiff,   | SAN FRANCISCO DIVISION                              |
| 4      | V.   |   |
| 5      | FACEBOOK, INC.  Defendant.   |   |
| 6      | Defendant.   |   |
| 7      |  |   |
| 8<br>9 | LUCY GERENA, on behalf of herself and all others similarly situated,     |   |
| 10     | Plaintiff  | CASE NO. 3:18-CV-02201-VC<br>SAN FRANCISCO DIVISION |
| 11     | V.   | CONSENT MOTION                                      |
| 12     | FACEBOOK, INC.   |   |
| 13     | Defendant  |   |
| 14     |  |   |
| 15     |  |   |
| 16     | PATRICIA KING, on behalf of herself and all others similarly situated,   |   |
| 17     | Plaintiff,   | CASE NO. 3:18-CV-02276-VC                           |
| 18     | v.   | SAN FRANCISCO DIVISION                              |
| 19     | FACEBOOK, INC. and CAMBRIDGE   | CONSENT MOTION                                      |
| 20     | ANALYTICA LLC  |   |
| 21     | Defendants.  |   |
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Facebook, Inc. ("Facebook") respectfully submits this reply in support of its April 18, 2018 Motion to Stay, currently noticed for argument on May 24, 2018.

Plaintiffs' oppositions to Facebook's motion to stay all proceedings pending a ruling from the JPML in MDL No. 2843 were due on May 2, 2018. As of today, no plaintiff has lodged an opposition. Prior to filing, plaintiffs in *Rubin*, *Gennock*, *O'Kelly*, *Beiner*, *Haslinger*, *Kooser*, *Iron Wing*, *Gerena* and *King* consented to this relief. *O'Kelly* filed a response indicating no objection "provided it is entered without prejudice to Plaintiffs' ability to seek interim relief from the Court if necessary," which the proposed order already provides. *O'Kelly*, Dkt. 16. *Gerena* also filed a document indicating plaintiffs' "nonopposition" to the stay. *Gerena*, Dkt. 18. *Rubin* also filed a pleading indicating that he "agrees to Facebook's Motion to Stay." *Rubin*, Dkt. 32. Other plaintiffs have not filed any response.

As plaintiffs have not opposed Facebook's requested relief, Facebook respectfully requests that the Court enter Facebook's proposed order and, pursuant to Local Rule 7-1(b), that the Court do so without holding argument.

Gibson, Dunn &

| 1   | DATE: May 9, 2018 | Respectfully submitted,   |
|-----|-------------------|---|
| 2   |                   | GIBSON, DUNN & CRUTCHER, LLP  |
| 3   |                   | By: /s/ Joshua S. Lipshutz<br>Joshua S. Lipshutz (SBN 242557)                                 |
| 4   |                   | jlipshutz@gibsondunn.com<br>GIBSON, DUNN & CRUTCHER LLP                                       |
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| 7 8 |                   | Orin Snyder ( <i>pro hac vice</i> ) osnyder@gibsondunn.com                                    |
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| 10  |                   | New York, NY 10166-0193<br>Telephone: 212.351.4000  |
| 11  |                   | Facsimile: 212.351.4035   |
| 12  |                   | Kristin A. Linsley (SBN 154148)<br>klinsley@gibsondunn.com                                    |
| 13  |                   | Brian M. Lutz (SBN 255976) blutz@gibsondunn.com   |
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| 15  |                   | Telephone: 415.393.8200<br>Facsimile: 415.393.8306  |
| 16  |                   | Attorneys for Defendant Facebook, Inc.  |
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